

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
BERNARD RIMPEL, M.D.,

Plaintiff,

-against-

ADVANTAGECARE PHYSICIANS, P.C.,

Defendant.  
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REPLY DECLARATION OF  
MICHAEL C. SCHMIDT

17-CV-06867 (NGG) (PK)

MICHAEL C. SCHMIDT, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney admitted to practice before this Court, and am a member of the law firm of Cozen O'Connor, counsel for Defendant AdvantageCare Physicians, P.C. in the above-captioned action. I respectfully submit this reply declaration in further support of Defendant's instant motion for an order granting summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and dismissing the Complaint in its entirety.

2. I have annexed hereto a true and accurate copy of the following exhibit in further support of Defendant's motion:

Exhibit A. Human Resources investigation notes.

Dated: New York, New York  
August 16, 2019

  
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Michael C. Schmidt (MS 7841)